

From: Bill Neburka [mailto:Bill@worksarchitecture.net]
Sent: Tuesday, May 10, 2016 2:13 PM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: Testimony Related To Mixed Use Zones

I'd like to share some of my concerns regarding the current MUZ package. I've been tracking this package closely and have serious issues with the reduction of allowed FAR, building profile dictations and the overall feeling that we are embarking on a major regression of our city's progressive density goals. I've attempted to outline my concerns below:

FAR changes:

The compromises made as part of the MUZ process have essentially resulted in a direct down-zoning of the base zone allowances across most, if not all, of the C and EXd zones.

Doing so results in a penalty for property values, taxable values and dis-incentivizes development.

The attempts to "incentivize" increased FAR to get back to an allowed FAR that matches the allowed heights on the lots are poorly convinced and some of the incentives have actually been eliminated as the plan has progressed.

The current plan is being developed during a development bubble and we all know that property investment and development is cyclical... those of us that remember what it was like only a few years ago – when our city was starving for development progress - know that a down-zoning and reduction in progressive density now, will have giant effects down the road.

During the most recent downturn, we saw development come to a halt and we saw property values drop. This results in lower property taxes and the funds paid by development projects (SDC, school excise, etc) dry up and our city's ability to fund and operate becomes a slow crawl.

The hope that requiring that you must include affordable housing in order to earn back the FAR that this plan takes away is ill fated and additionally, the likely coming inclusionary housing rules could further push that needle, resulting in developments that only build what they can provide under the new,, reduced base zone allowances, if anything at all.

The goal should be to ensure that the maximum FAR is achieved when a site is being developed. Once a reduced FAR is constructed it will be there for a very long time.

Massing and Building Profiles:

The addition of the requirement for "stepped" street face setbacks is problematic for various reasons.

First, it confuses design guidelines and zoning and uses requirements. The zoning of the site shouldn't dictate form. This measure immediately creates one type of building massing that isn't always desirable and isn't functionally better.

Secondly, this stepped massing concept is being fed by a small, but vocal, group that feels that our main streets seem to dense. The main streets are where there should be that density and scale. Our last round of urban planning understood this and this fundamental element of building density and capacity within our city.

Regression:

Portland has long been a symbol and progressive zoning and transportation policy. We repeatedly uphold the growth boundary, which means that we support focused growth within our close-in neighborhoods. In this current cycle, we have seen leaps in that urban form and this proposal is putting the brakes on what we had collectively planned for and supported. I blame this shift on concerns around "change" and the naïve idea that this pace of development will continue in perpetuity. We are at the top of a real-estate bubble and there will be a bottom again.. this is the way the world works. Reducing FAR and restricting building forms are reactive measures and don't maintain the long term goals of our city.

This regression reduces the property values in Portland. Down-zoning needs to be taken seriously as its impacts can have a ripple effect across project feasibility and funding and realization.

In summary, I strongly urge the planners and commissioners to take care in what gets placed into code today – it will have long term impacts on development and in turn, affordability. Once you set this in motion there isn't an easy way to reverse it. Be brave and continue to support the progressive city that Portland is meant to be and not a regressionary version of itself.

Sincerely,

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